

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHLOE M. DASILVA,

Defendant.

Case No. 23-mj-00035-JAM

MOTION FOR DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of Chloe M. DaSilva, pursuant to 18 U.S.C. § 3142(f)(2)(A), and states the following in support of the motion:

1. This motion is being made at the defendant's first appearance before a judicial officer. A complaint has been filed charging the defendant with interference with a flight attendant, in violation of 49 U.S.C. 46504.

2. The United States submits that the defendant is a flight risk and that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court.

3. The defendant is a flight risk because she is not a resident of Kansas City, Missouri. The defendant was a passenger on a commercial airline that was diverted to Kansas City on a flight intended to land in Chicago, Illinois, with a final destination of Boston, Massachusetts.

WHEREFORE, based on the foregoing, the United States requests that the Court hold a detention hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By */s/Matthew A. Blackwood*

Matthew A. Blackwood
Assistant United States Attorney

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 10, 2023, to the CM-ECF system of the United States District Court for the Western District of Missouri, a copy of the foregoing document will be hand-delivered to the defendant at her first appearance before a judicial officer.

/s/Matthew A. Blackwood

Matthew A. Blackwood
Assistant United States Attorney